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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN, CARLOS  
ALANIZ, individually and successors-in-  
interest to JOHN ALANIZ, deceased,

Plaintiff,

vs.

STATE OF CALIFORNIA, RAMON  
SILVA, and DOES 1-10, inclusive,

Defendants.

Case No. 2:23-cv-07532-DMG-SSC

Assigned to:

Hon. Dolly M. Gee

Hon. Magistrate Stephanie S.  
Christensen

**DECLARATION OF SHANNON J.  
LEAP IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' EX PARTE  
APPLICATION TO FILE MOTION  
FOR WITHDRAWAL AND  
SUPPORTING DOCUMENTS  
UNDER SEAL.**

**DECLARATION OF SHANNON J. LEAP**

I, Shannon J. Leap, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California and the United States District Court for the Central District of California. I am one of the attorneys of record for the Plaintiffs. I make this declaration in support of Plaintiffs' Opposition to Defendants' Ex Parte Application to File Motion for Withdrawal and supporting documents under seal. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. To the best of my knowledge, neither myself nor my office received any notification of objections to Plaintiffs' subpoena on the DOJ for the production of documents and materials of the investigative file of the AB 1506 shooting investigation. The documents were produced to plaintiffs on September 13, 2024.

3. On November 21, 2024, counsel for all parties, including myself, attended inspection of physical evidence at the California Department Of Justice, pursuant to Defendants' Subpoena. Law enforcement personnel from a separate unit within the DOJ from Defense Counsel attended the inspection and acted as the custodians of evidence. They informed all attorneys, parties, and experts at the inspection that no items of evidence would be permitted to be unsealed, opened, or removed from their containers (which were paper bags, or otherwise opaque), and no one would be permitted to take photos of the items on that date.

4. The DOJ law enforcement personnel informed all attendees that an inspection of evidence at a later time in the appropriate laboratory would be permitted, in order to maintain the integrity of the physical pieces of evidence.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 29th day of November, 2024 in Los Angeles, California.

/s/ Shannon J. Leap

Shannon J. Leap